

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEREMEY PARKER,

Defendant.

INDICTMENT

(18 U.S.C. § 1030(a)(4))
(18 U.S.C. § 1343)

CR 10-280 RHK JJG

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Fraud in Relation to Computers)

From on or about December 23, 2008, through and including on or about October 15, 2009, in the State and District of Minnesota and elsewhere, the defendant,

JEREMEY PARKER,

did knowingly and with intent to defraud access a protected computer without authorization, and by such access furthered a fraud and obtained something of a value greater than five thousand dollars (\$5,000), and consisting of more than the use of the computer he had accessed without authorization, specifically, money belonging to SWReg., Inc. and others, in violation of Title 18, United States Code, Section 1030(a)(4) and (c)(3)(A).

COUNT 2

(Wire Fraud)

From on or about December 23, 2008, through and including October 15, 2009, in the State and District of Minnesota and

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elsewhere, the defendant,

JEREMEY PARKER,

devised and intended to devise a scheme and artifice to defraud SWReg., Inc., of money and property by means of materially false and fraudulent pretenses, representations, and promises. In furtherance of the scheme and artifice to defraud, the defendant transmitted and caused to be transmitted by means of wire and radio communication in interstate commerce writings, signs, signals, pictures, and sounds. Specifically, on or about October 15, 2009, the defendant, located in Texas, sent via the Internet electronic signals to the computer server of SWReg., located in Minnesota, and through the transmission of those electronic signals was able to gain access to account information held on the SWReg. computer server, and by means of such access direct that SWReg. disburse funds to a bank account of the defendant's in Texas, all in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATIONS

Counts 1 and 2 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(B), and Title 28, United States Code, Section 2461(c).

As the result of the offenses alleged in Counts 1 and 2 of this Indictment, the defendant shall forfeit to the United States

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pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(B) any property, real or personal, which constitutes or is derived from proceeds traceable to the violations alleged in Counts 1 and 2 of this Indictment.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and by Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON